

2.4.9 LAC 33:III Chapter 15 – Emission Standards for Sulfur Dioxide

It is requested that the administrative authority, Louisiana Department of Environmental Quality (LDEQ), continue to exempt the affected equipment from the emission limitations of LAC 33:III.1503, since the emission points will emit less than 250 tons per year of SO₂ and from the limitation of LAC 33:III.1511, since the emission points will emit less than 100 tons per year of SO₂. Calumet shall continue to comply with the recordkeeping and reporting provisions of LAC 33:III.1513.

2.4.10 LAC 33:III.2113 – Housekeeping

This regulation states that the best practical housekeeping and maintenance practices must be maintained at the highest possible standards to reduce the quantity of organic compounds emissions. Calumet shall continue to comply with the provisions of this regulation.

2.4.11 LAC 33:III.2121 – Fugitive Emission Control

This regulation is applicable to equipment components in petroleum refineries, that contain components specified in the regulation that are intended to operate in VOC service 300 hours or more during the calendar year. Calumet shall continue to comply with the provisions of this regulation.

2.4.12 LAC 33:III.2141 – Refinery Process Unit Turnarounds

Emissions of volatile organic compounds from petroleum refinery process unit turnarounds shall be controlled by pumping the liquid contents to storage and depressurizing the processing units to five psig or below before venting to the atmosphere. Calumet shall continue to comply with this regulation.

2.4.13 LAC 33:III Chapter 56 – Prevention of Air Emergency Episodes

This regulation requires facilities to have and follow an Air Pollution Emergency plan. Calumet has prepared a standby plan for the reduction of emissions during emergency episodes, as required in LAC 33:III.5609. This plan is available to the administrative authorities as required by LAC 33:III.5611.

2.5 “IT Decision” Questions

The following provides the responses prepared by the Calumet Lubricants Company, LP - Princeton Refinery.

1. **Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?**

Calumet Lubricants Company, LP – Princeton Refinery is an existing, well-established facility. The facility makes on-going, day-to-day efforts to minimize any adverse effects from the facility on environmental quality as part of the company's environmental compliance program. The program emphasizes preventative measures, daily surveillance, on-going operational improvements, and personnel training to minimize any environmental effects.

2. **Does a cost benefit analysis of the environmental impact cost balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?**

The Calumet Lubricants Company, LP – Princeton Refinery is an existing facility. However, when the facility was built, various factors were taken into account, including a cost-benefit analysis of the environmental impact costs balanced against the social and economic benefits far outweigh the environmental impacts.

3. **Are there alternative projects that would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?**

The Calumet Lubricants Company, LP – Princeton Refinery is an existing facility. However, when the facility was built, various factors were taken into account, including road and rail service, power and water supply, labor supply, and land availability.

4. **Are there alternative sites that would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?**

The level of protection afforded by the present location of the facility provides adequate protection of the surrounding environment. The facility has been designed to minimize any adverse impacts to the environment.

5. **Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits?**

Calumet Lubricants Company, LP – Princeton Refinery is committed to comply with all environmental regulations, and to implement the mitigation measures necessary to effect compliance. Measures to provide more effective environmental protection are implemented on an as-needed basis.